

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

R.I. SEEKONK HOLDINGS, LLC.

Plaintiff

VS.

C.A. No.: 04 CV 11682 NMG

TIMOTHY P. McINERNEY, et al
Defendants

CERTIFICATION

Pursuant to D. Mass Local R. 7.1(A)(2), the undersigned counsel for the Plaintiff, RI Seekonk Holdings, LLC, hereby certifies that I have conferred with Attorney Lehane (a lawyer and proposed deponent) in an attempt to resolve or narrow the issues concerning Plaintiff's Motion to Compel his deposition testimony. I have also attempted to confer with Attorney Silverfine (representing the Defendants) prior to filing this Motion. In the absence of an Order of this Court, Mr. Lehane has informed me that he either will not appear and/or will refuse to answer questions at his proposed deposition.

RI Seekonk Holdings, LLC
By its attorney,

/s/ John B. Reilly
John B. Reilly, Esq. (BBO # 545576)
John Reilly & Associates
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(401) 739-1800
FAX: (401) 738-0258

CERTIFICATION

I hereby certify that a copy of the **Certification** has been sent, by regular mail, to **Michael C. Lehane, Esq.**, Murphy, Hesse, Toomey & Lehane, LLP, Crown Colony Plaza, 300 Crown Colony Drive, Suite 410, PO Box 9126, Quincy, MA 02269-9126, this 6th day of April, 2006.

/s/ John B. Reilly